

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

RENITA CHALEPAH, as personal)	
representative of the estate of Zachary)	
Nicholas Bear Heels for the benefit of the)	8:18-CV-381
heirs and next of kin and as personal)	
representative of the estate of Zachary)	
Nicholas Bear Heels, deceased;)	PLAINTIFF'S STATEMENT
)	OF EXPERT REBUTTAL
Plaintiff,)	WITNESSES
)	
v.)	
)	
THE CITY OF OMAHA, a Nebraska)	
Political Subdivision, <i>et al.</i> ,)	
)	
Defendants.)	

COMES NOW Plaintiff, Renita Chalepah, pursuant to Fed.R.Civ.P. 26(a)(2)(c), and hereby identifies the following retained expert rebuttal witnesses:

1. Andy Adler
 Professor and Canada Research Chair, Engineering
 Carleton University
 Ottawa, Canada

2. Jeff Dawson
 Department of Biology
 Carleton University
 Ottawa, Canada

Andy Adler is a full professor at Carleton University in Ottawa, Canada. He has focused his research on the use of electrical energy for biomedical applications. He has been involved in developing test methodologies and evaluations for conducted energy weapons (CEWs) with a focus on the Taser. Adler reviewed the Taser examination and testing report authored by Taser after downloading the pulse logs from the actual Taser X26P involved in the death of Zachary Bear Heels.

Jeff Dawson is an associate professor at Carleton University in Ottawa, Canada. His research focus is in the area of biomechanics and neurobiology. Dawson has collaborated on this project with Professor Adler and contributed expertise on the subject of neuromuscular control.

RENITA CHALEPAH, Plaintiff

BY: s/ Thomas White
Thomas M. White, #17452
Amy S. Jorgensen, #23215
WHITE & JORGENSEN
3114 St. Mary's Avenue
Omaha, NE 68105

And

Garvin A. Isaacs OK Bar # 4559
Debbie Maddox, OK Bar #13166
GARVIN A. ISAACS INC.
1400 North Shartel Avenue
Oklahoma City, Oklahoma 73103
405.232.2060

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that on the 16th day of July, 2020, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which sent notification of such filing to Michelle Peters and Ryan Weisen, 1819 Farnam Street, Suite 804, Omaha NE 68183.

Thomas M. White